



U.S. Department of Justice

United States Attorney
Southern District of New York

Jacob K. Javits Federal Building
26 Federal Plaza
New York, NY 10278

April 29, 2025

BY ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl St. New York, NY 10007-1312
New York, New York 10007

**Re: *United States v. Guo, et al.*, S3 23 Cr. 118 (AT)
 United States v. Wang, S4 23 Cr. 118 (AT)**

Dear Judge Torres:

The Government respectfully submits this joint status letter as the Court directed at the most recent conference.

First, with respect to redactions of privileged information from the December 20, 2024 and March 3, 2025 transcripts of *ex parte* proceedings regarding Guo's change of counsel, Guo's prior counsel will publicly file the *ex parte* portions of the transcripts with proposed redactions by today. Also today, Guo's prior counsel will submit unredacted copies of the transcripts to chambers *ex parte*, for in camera review, with yellow highlighting indicating the material that defense counsel proposes to redact. (*See* Dkt. 512.)

Second, with respect to forfeiture and whether Guo is claiming a personal interest in any of the property subject to forfeiture, the Government and Guo's newly-appointed counsel have conferred and, following a request from the defense, the Government has identified for counsel certain information and evidence in an effort to further the parties' discussions. The parties propose that the Court permit them to provide a further joint status letter to the Court by May 9, 2025.

* * *

The Government is available to address any questions the Court may have.

Respectfully submitted,

JAY CLAYTON
United States Attorney

Southern District of New York

By: /s/
Micah F. Fergenson
Ryan B. Finkel
Justin Horton
Juliana N. Murray
Assistant United States Attorneys
(212) 637-2190 / 6612 / 2276 / 2314